

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

In re:

Case No.: 6:15-bk-01838-KSJ  
Chapter 7

JODELL M. ALTIER,

Debtor.

**TRUSTEE'S APPLICATION TO APPROVE PAYMENT  
OF ADMINISTRATIVE EXPENSE**

**NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING**

Pursuant to Local Rule 2002-4, the Court will consider this motion, objection, or other matter without further notice or hearing unless a party in interest files an objection within thirty (30) days from the date set forth on the proof of service attached to this paper plus an additional three (3) days for service. If you object to the relief requested in this paper, you must file your response with the Clerk of the Court at George C. Young Federal Courthouse, 400 West Washington Street, Suite 5100, Orlando, FL 32801 and serve a copy on the Trustee's attorney, Michael A. Nardella, Esq., Nardella & Nardella, PLLC, 250 E. Colonial Dr., Ste 102, Orlando, FL 32801, and a copy on the U.S. Trustee, George C. Young Federal Courthouse, 400 West Washington Street, Suite 1100, Orlando, FL 32801, within the time allowed.

If you file and serve a response within the time permitted, the Court may schedule and notify you of a hearing, or the Court may consider the response and may grant or deny the relief requested without a hearing. If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

Pursuant to 11 U.S.C. § 503(b) and Local Bankruptcy Rule 2015-1 Gene T. Chambers, Chapter 7 Trustee in Bankruptcy for Jodell M. Altier ("Trustee"), by and through her undersigned counsel, submits her Application to Approve Payment of Administrative Expense, and states as follows:

1. Debtor, Jodell M. Altier ("Debtor") filed for a voluntary chapter 7 bankruptcy petition on March 4, 2015, in Case Number 6:15-bk-01838-KSJ (the "Petition Date").
2. Gene T. Chambers ("Trustee") was appointed as the Chapter 7 Trustee in this case.

3. Trustee, the Debtor, and other parties recently mediated over the recapture of certain fraudulent transfers, and the mediation was directly related to the administration of this bankruptcy estate. The mediation resulted in a settlement agreement (objection pending).

4. Trustee's counsel received an invoice from the mediator, Andrew Brumby, for his services as mediator in this matter. The invoice is for \$4,200.00 which has been divided among the parties. Trustee is responsible for payment of a third of the invoice, *i.e.* \$1,400.00. A true and correct copy of the mediator's invoice is attached hereto as **Exhibit A.**

5. Pursuant to L.R. 2015-1, "Chapter 7 trustees may incur and pay expenses directly related to the administration of the estate not to exceed \$500.00 in the aggregate without order of the Court."

6. Since the invoice exceeds \$500.00, Trustee is requesting a court order approving this motion to pay her portion of the mediator's invoice in the total amount of \$1,400.00 from the estate.

7. There are sufficient funds in the estate to pay this invoice.

8. The Trustee believes the amount to be fair and reasonable and that the services provided were actual and necessary expenses for the estate.

WHEREFORE, the Trustee respectfully requests that this Court enter an Order approving her Motion to pay the mediator's invoice of \$1,400.00 from the estate funds, and other such relief as the Court deems just and proper.

Respectfully submitted this 26th day of May, 2016.

/s/ Michael A. Nardella  
Michael A. Nardella, Esq.  
Florida Bar No. 051265  
Anthony M. Nardella, Jr., Esq.  
Florida Bar No. 341274  
Nardella & Nardella, PLLC

250 East Colonial Drive, Suite 102  
Orlando, FL 32801  
(407) 966-2680  
[mnardella@nardellalaw.com](mailto:mnardella@nardellalaw.com)  
[akeppel@nardellalaw.com](mailto:akeppel@nardellalaw.com)

**Counsel for Gene T. Chambers, in  
her capacity as chapter 7 Trustee  
for the Estate of Jodell Altier**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was furnished via electronic mail using the Court's CM/ECF system and/or via First Class U.S. Mail on the 26th day of May, 2016, Debtor: Jodell M. Altier, 2507 Roat Drive, Orlando, FL 32835; Debtor's Counsel: Jonathan B. Alper, Esquire, Jonathan B. Alper PLC 274 Kipling Court, Heathrow, FL 32746; Office of the U.S. Trustee, George C. Young Federal Building, 400 W. Washington Street, Suite 1100, Orlando, FL 32801-2210.

/s/ Michael A. Nardella  
Michael A. Nardella, Esq.

## SHUTTS &amp; BOWEN LLP

ATTORNEYS AND COUNSELORS AT LAW

209 SOUTH BISCAYNE BOULEVARD, SUITE 4100  
 MIAMI, FLORIDA 33131  
 FORT LAUDERDALE (954) 524-5505 • MIAMI (305) 358-6300 • ORLANDO (407) 423-3200  
 SARASOTA (941) 552-3500 • TALLAHASSEE (850) 521-0600 • TAMPA (813) 229-8900 • WEST PALM BEACH (561) 835-8500  
 E-mail: [billing@shutts.com](mailto:billing@shutts.com)

EXHIBIT A

Please note our new Miami office address

Michael A. Nardella, Esq.  
 Burr & Forman LLP  
 200 S Orange Ave, Ste 800  
 Orlando, FL 32801-6404  
[michael.nardella@burr.com](mailto:michael.nardella@burr.com)

Justin M. Luna, Esq.  
 Latham, Shuker, Eden & Beaudine, LLP  
 111 N. Magnolia Avenue, Suite 1400  
 Orlando, FL 32801  
[jluna@lseblaw.com](mailto:jluna@lseblaw.com)

Jonathan Alper, Esq.  
 Alper Law  
 274 Kipling Court  
 Heathrow, FL 32746  
[jalper@alperlaw.com](mailto:jalper@alperlaw.com)

May 16, 2016

Atty No.: 0195  
 Invoice: 1127055

Client: 12149-0124

Re: *Altier Mediation*For professional services rendered thru: *April 30, 2016*

Total Service	4,200.00
Total Expense	0.00
Credits Applied	(0.00)
<b>Current Balance Due</b>	<b>4,200.00</b>
<b>Prior Balance Due</b>	<b>0.00</b>
<b>Total Balance Due</b>	<b>\$4,200.00</b>

<b>Burr &amp; Forman LLP – Balance Due:</b>	<b>\$1,400.00</b>
<b>Alper Law – Balance Due:</b>	<b>\$1,400.00</b>
<b>Latham, Shuker, Eden &amp; Beaudine, LLP – Balance Due:</b>	<b>\$1,400.00</b>

## Terms: DUE UPON RECEIPT.

A 1% per month late payment charge will apply on any unpaid balance over 30 days from date of invoice.  
 Federal I.D. No. 59-0447122

TO ENSURE PROPER CREDIT, PLEASE RETURN ONE COPY OF THE COVER SHEET WHEN MAKING  
 PAYMENT. THANK YOU.